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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc.,*

16 *and Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

22 Case No. 07-5944 SC  
23 MDL No. 1917

24 This Document Relates To:

25 *The Indirect Purchaser Action*

26 *Electrograph Systems, Inc. et al. v. Hitachi,*  
27 *Ltd. et al., No. 11-cv-01656;*

28 *Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,*  
*No. 11-cv-05513;*

*Sears, Roebuck and Co., et al. v. Chunghwa*  
*Picture Tubes, Ltd., et al., No. 11-cv-05514;*

**SUPPLEMENTAL DECLARATION  
OF LUCIUS B. LAU IN SUPPORT  
OF THE TOSHIBA DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT CONCERNING  
WITHDRAWAL**

SUPPLEMENTAL DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE  
TOSHIBA DEFENDANTS' MOTION FOR SUMMARY JUDGMENT CONCERNING WITHDRAWAL

Case No. 07-5944-SC  
MDL No. 1917

1 *Interbond Corporation of America v. Hitachi, et*  
2 *al.*, No. 11-cv-06275;

3 *Office Depot, Inc. v. Hitachi, Ltd., et al.*,  
4 No.11-cv-06276;

5 *CompuCom Systems, Inc. v. Hitachi, Ltd. et al.*,  
6 No. 11-cv-06396;

7 *Costco Wholesale Corporation v. Hitachi, Ltd.,*  
8 *et al.*, No. 11-cv-06397;

9 *P.C. Richard & Son Long Island Corporation,*  
10 *et al. v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

11 *Schultze Agency Services, LLC v. Hitachi, Ltd.,*  
12 *et al.*, No. 12-cv-02649;

13 *Tech Data Corporation, et al. v. Hitachi, Ltd.,*  
14 *et al.*, No. 13-cv-00157;

15 *Sharp Electronics Corp., et al. v. Hitachi, Ltd.,*  
16 *et al.*, No. 13-cv-01173.

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SUPPLEMENTAL DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE  
TOSHIBA DEFENDANTS' MOTION FOR SUMMARY JUDGMENT CONCERNING WITHDRAWAL

Case No. 07-5944 SC

MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for  
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer  
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic  
5 Components, Inc. (collectively, the "Toshiba Defendants").

6 2. I submit this declaration in support of the Toshiba Defendants' Reply  
7 Memorandum In Support Of Their Motion for Summary Judgment Concerning Withdrawal,  
8 filed contemporaneously herewith. I have personal knowledge of the facts stated herein, and  
9 I could and would competently testify thereto if called as a witness.

10 3. Attached hereto as Exhibit O is a true and correct copy of excerpts from the  
11 transcript of the Rule 30(b)(6) deposition of Toshiba Corporation (Koji Kurosawa), dated  
12 July 30, 2012.

13 4. Attached hereto as Exhibit P is a true and correct copy of excerpts from the  
14 transcript of the deposition of Hirokazu Nishiyama, dated July 17, 2012.

15 5. Attached hereto as Exhibit Q is a true and correct copy of excerpts from the  
16 transcript of the deposition of Tomoyuki Kawano, dated October 27, 2014.

17 6. Attached hereto as Exhibit R is a true and correct copy of excerpts from the  
18 transcript of the Rule 30(b)(6) deposition of Toshiba Corporation (Mio Tamba), dated  
19 September 24, 2014.

20 7. Attached hereto as Exhibit S is a true and correct copy of excerpts from the  
21 transcript of the Rule 30(b)(6) deposition of Toshiba America Electronic Components, Inc.  
22 (Jay Heinecke), dated July 31, 2012.

23 8. Attached hereto as Exhibit T is a true and correct copy of excerpts from the  
24 transcript of the deposition of Norio Fujita, dated June 6, 2015.

25 9. Attached hereto as Exhibit U is a true and correct copy of a certified  
26 translation of a document produced in this litigation by Chunghwa Picture Tubes, Ltd.  
27 bearing the Bates numbers CHU00029175 through CHU00029178.  
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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Lucius B. Lau